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April 12, 2011

BY ECF

Hon. James Orenstein  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Gavriel Bidany  
Criminal Docket No. 11-259 (JO)

Dear Judge Orenstein:

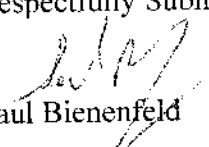
Request is hereby made to change the bond conditions of the above named defendant so that he may be permitted to travel to Israel for the Passover holiday. I have recently learned that the Defendant's father is gravely ill. We have secured an additional \$250,000 cash bond in the form of a cashiers check made payable to "Clerk of the US District Court". We are respectfully seeking that Your Honor accept this additional bond and order the return of the Defendant's passport and allow the Defendant to return to Israel for Passover. He will return to New York to face a trial prior to May 3, 2011, his trial date.

I have spoken with AUSA David Sarratt as well as Pre Trial Services Officer, Michael Ilaria who have both consented to this request.

I have also explained the request as well as the risks to each of the three sureties. Each surety has sent me an email acknowledging the additional risk and consenting to the change.

With the Courts permission we would like to appear before Your Honor tomorrow along with the new surety who will be posting the cash bond. I understand that the AUSA has a case before you on another matter at 3PM and we would be able to appear at that time as well. Please let me know a convenient time for the Court to present this new surety.

Respectfully Submitted,

  
Saul Bienenfeld

cc: AUSA David Sarratt via e-mail  
Pre Trial Services Officer Michael Ilaria via fax 718-613-2488